



**BUSINESS CONTINUITY PLAN
CLIENT DISCLOSURE**
(Last Amended: September 2021)

Businesses may experience varying degrees of business disruption. These disruptions may last from a few minutes to a few months or longer. RhumbLine Advisers Limited Partnership (“RhumbLine”) has assessed the risks of a disruption to its business and has devised a Business Continuity Plan (“Plan”) intended to permit us to continue critical business operations during a range of disruptions, including a significant business disruption (“SBD”) (e.g., a major destruction or incapacity of our facilities and/or systems). As a valued client, you should be aware of the steps RhumbLine may take to be able to continue operating in the event of some form of disruption. RhumbLine maintains a “three tier” approach to business continuity with each tier or aspects thereof addressing business disruptions of increasing severity:

Tier 1 is defined as a business disruption where physical access to our office space at 265 Franklin Street is not possible or functional but our computer network at the site is functioning normally. In this situation, all RhumbLine employees including account operations, investment management and trading, and client service personnel have full and secure access to the primary RhumbLine network from any remote location where Internet access is available.

Tier 2 is defined as a business interruption of a third party, which impacts the use of services or products deemed mission critical. To reduce the risk of this type of disruption, RhumbLine maintains a database of all key third party service providers used by the Firm which includes the service provided, contact information and date of last due diligence review. RhumbLine has also performed a risk assessment to determine which of these vendors provide services or products critical to RhumbLine’s operations and the likelihood of a potential disruption. RhumbLine has assessed these vendors’ ability to continue to provide services to RhumbLine by obtaining and reviewing copies of their service agreements, business continuity plans and other relevant policies. In many instances, RhumbLine also has multiple sources or back up providers for critical services, data and products such as accounting records, internet access, constituent data, pricing information, trading platforms, etc.

If a “tier 2” level disruption is caused by the temporary loss of one or more of RhumbLine’s production servers then the Director of IT is authorized to bring on-line a fully imaged backup copy of the affected server. Images of all production servers are maintained by RhumbLine’s managed service provider (“MSP”) in a cloud-based hosting facility located in Dallas, Texas. Images are refreshed in near real-time and the recovery time objective (RTO) for backup production servers is under an hour.

Tier 3 is defined as a business disruption where both physical access to 265 Franklin Street is not possible and our computer network is not functioning. To mitigate a “tier 3” disruption, RhumbLine maintains a complete duplicate production environment hosted at a secure facility located in Dallas, Texas. The duplicate environment is managed by RhumbLine’s MSP and is updated from the production environment in near real-time. The recovery time objective (RTO) to bring the full DR site on-line could be as soon as 1 hour, but in nearly all scenarios would be within the same business day. The DR site is provisioned to support all current RhumbLine employees concurrently and remote access to the site is through a secure VPN connection maintained by the MSP. All remote sessions require multi-factor authentication (MFA).

Contact Us – If after a significant business disruption you cannot reach us as you normally do at 617-345-0434 or via email (usually the employee’s initials followed by @indexmng.com), we advise you to visit our website at <https://rhumblineadvisers.com> to see if our business continuity plan is in effect. RhumbLine will also contact its employees, clients and key vendors as quickly as possible to alert them of the SBD and provide them with our alternate contact information.

Clients should be aware that RhumbLine does not maintain custody of clients’ funds or securities, as these assets are maintained independently at the custodian banks. In the event of any SBD, our clients will be directed to contact their custodian for access to their accounts.

This Plan will be subject to ongoing review and may be modified as the need arises. A copy of this document will be distributed to our clients annually and is also available on our website at <https://rhumblineadvisers.com>.